

**BROWN & CONNERY, LLP**

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Attorneys for TD Bank, N.A.

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In Re:

CAROLE A. OTT,

Debtor.

PROCEEDINGS IN CHAPTER 7

Case No. 09-28011 (RTL)

**NOTICE OF CROSS-MOTION  
TO ABSTAIN**

**Hearing Date: 9/21/09 @10:00 a.m.**

TD Bank, N.A., by way of cross-motion, requests that the Court enter an order abstaining from hearing the state court matter; granting stay relief; retaining jurisdiction for the purposes of determining the Debtor's right to a discharge and/or dischargeability of individual debts; and for such other and further relief as the Court may find necessary or proper in connection with this cross-motion.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the Court to grant TD Bank, N.A.'s cross-motion, then you or your attorney must:

File with the Court a written response to TD Bank, N.A.'s cross-motion explaining your position. Your response must be filed with the Bankruptcy Clerk at the United States Bankruptcy Court, District of New Jersey, 402 E. State Street, Trenton, New Jersey 08608.

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it** on or before the date stated above.

You must mail a copy to:

Michelle H. Badolato, Esquire  
Brown & Connery, LLP  
360 Haddon Avenue  
Westmont, NJ 08108  
**Attorney for TD Bank, N.A.**

Barry R. Sharer  
Wagner, Sharer, Murtaugh & Petree  
1103 Laurel Oak Road, Suite 105B  
Voorhees, NJ 08043  
**Chapter 7 Trustee**

John W. Hargrave, Esquire  
Law Offices of John W. Hargrave  
117 Clements Bridge Road  
Barrington, NJ 08007  
**Attorney for Corinne Geiger  
Estates of Eleanor & Rose Scala**

Shoshanna Schiff, Esquire  
Trenk, DiPasquale, Webster,  
Della Fera & Sodono, P.C.  
347 Mt. Pleasant Avenue  
Suite 300  
West Orange, NJ 07052  
**Attorney for Debtor**

Daniel F. Corrigan, Esquire  
Bathgate, Wegener & Wolf, PC  
PO Box 2043  
1 Airport Road  
Lakewood, NJ 08701  
**Attorney for Lakewood Township**

If you are opposing the order TD Bank, N.A. is seeking from the Court, you must attend the hearing scheduled to be held on September 21, 2009, at 10:00 a.m., at the United States Bankruptcy Court, United States Post Office and Courthouse, 402 E. State Street, Trenton, New Jersey 08608, the Honorable Raymond T. Lyons, presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the cross-motion and may enter an order granting that relief.

**BROWN & CONNERY, LLP**  
Attorneys for TD Bank, N.A.,

Dated: September 14, 2009

By: /s/ *Michelle H. Badolato*

Michelle H. Badolato